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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

Civil No. 6:20-cv-01163-MK  
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY,

Defendants.

JOINT STATUS REPORT  
REGARDING DEPOSITION  
SCHEDULE FOR NON-EXPERT  
WITNESSES

VIDOCQ SOCIETY,  
Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY  
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,  
Plaintiffs,

Civil Case No. 3:21-cv-01719-MK  
(Trailing Case)

v.

OREGON STATE POLICE,  
Defendant.

Pursuant to the Court's Order dated May 10, 2023 (Dkt. No. 164), counsel for Plaintiffs and Defendants respectfully submit this Joint Status Report. The parties have agreed to the following deposition schedule for non-expert witnesses on the terms and conditions identified below:

<b><i>Deposition Date</i></b>	<b><i>Witness Identity</i></b>	<b><i>Noted By Lead Counsel</i></b>	<b><i>Location</i></b>	<b><i>Video?</i></b>
July 6, 2023	Megan Davidson	City/County Defendants	Portland	Yes
	Gabriella Cato	City/County Defendants	Portland	Yes

<b><i>Deposition Date</i></b>	<b><i>Witness Identity</i></b>	<b><i>Noted By Lead Counsel</i></b>	<b><i>Location</i></b>	<b><i>Video?</i></b>
July 7, 2023	Jazmin Spinner	City/County Defendants	Portland	Yes
	Abbie Beckham	City/County Defendants	Portland	Yes
	Aleksandra Djeric	City/County Defendants	Portland	Yes
July 10, 2023	Georgia Bartholomew	City/County Defendants	Portland	Yes
	Mother of Georgia Bartholomew	City/County Defendants	Portland	Yes
July 12, 2023	Rule 30(b)(6) – Coos County (Defendant)	Plaintiffs	Video Conferencing	No
	Rule 30(b)(6) – City of Coos Bay (Defendant)	Plaintiffs	Video Conferencing	No
July 13, 2023	Rule 30(b)(6) – City of Coquille (Defendant)	Plaintiffs	Video Conferencing	No
July 14, 2023	Anthony Wetmore (Coos Bay police)	Plaintiffs	Video Conferencing	No
July 17, 2023	Plaintiff S.M. (Plaintiff)	State Defendants	Video Conferencing	No
July 18, 2023	Shaun McCrea (Prior defense counsel)	State Defendants	Video Conferencing	No
July 24, 2023	Rule 30(b)(6) – Fisher Golf Group	Plaintiffs	Portland	No
July 25, 2023	Rule 30(b)(6) – Oregon State Police (Defendant)	Plaintiffs	Video Conferencing	No

<b><i>Deposition Date</i></b>	<b><i>Witness Identity</i></b>	<b><i>Noted By Lead Counsel</i></b>	<b><i>Location</i></b>	<b><i>Video?</i></b>
TBD*	Richard Walter* (Defendant) *subject to objection previously asserted by counsel and submission for court determination as necessary	Defendant Vidocq Society	Video Conferencing	No
Aug 17, 2023	Rule 30(b)(6) Vidocq Society* (Defendant) *subject to confirmation of availability	Plaintiffs	Video Conferencing	No
Aug 28, 2023	Scott Hamilton	Plaintiffs	Coos Bay	No
	Melissa Smith	City/County Defendants	Coos Bay	Yes
	Kyla Stevens	City/County Defendants	Coos Bay	Yes
Aug 29, 2023	R. Paul Frasier (District Attorney)	Plaintiffs	Coquille	Yes
Aug 30, 2023	Maegan Traglio	City/County Defendants	Coos Bay	Yes
	Robert Edgerton	City/County Defendants	Coos Bay	Yes
Sept 1, 2023	Mark Dannels (Chief of Police)	Plaintiffs	Video Conferencing	No
Sept 8, 2023	Kathy McGuffin (Plaintiff's Mother)	Plaintiffs	Kailua-Kona, Hawaii	Yes

Counsel for the parties further agree that with respect to each of the witnesses identified above, their depositions will be noted to require in-person attendance at the location specified, unless that witness's deposition is designated to be conducted by video conferencing, in which case their respective depositions will be noted accordingly. Regardless of how each witness is

required to appear, all depositions will have a Zoom video conference option to be paid for by the

party or parties utilizing the option.

The parties also agree that this deponent schedule should not be construed as a stipulation of exclusivity, but that additional deponents may be sought with appropriate consultation of counsel and/or leave of Court within the applicable discovery cutoff deadline.

DATED: June 1, 2023

<p>MALONEY LAUERSDORF REINER PC</p> <p>By <u>s/Andrew C. Lauersdorf</u>  Janis C. Puracal, OSB #132288  E-Mail: <a href="mailto:jcp@mlrlegalteam.com">jcp@mlrlegalteam.com</a>  Andrew C. Lauersdorf, OSB #980739  E-Mail: <a href="mailto:acl@mlrlegalteam.com">acl@mlrlegalteam.com</a></p> <p>Attorneys for Plaintiffs</p>	<p>LOEVY &amp; LOEVY</p> <p>By <u>s/David B. Owens</u>  David B. Owens, <i>pro hac vice</i>  E-Mail: <a href="mailto:david@loevy.com">david@loevy.com</a></p> <p>Attorneys for Plaintiffs</p>
<p>LAW OFFICE OF ROBERT FRANZ JR.</p> <p>By <u>s/Robert E. Franz Jr.</u>  Robert E. Franz Jr., OSB #730915  E-Mail: <a href="mailto:rfranz@franzlaw.comcastbiz.net">rfranz@franzlaw.comcastbiz.net</a>  Sarah R. Henderson, OSB #153474  E-Mail: <a href="mailto:shenderson@franzlaw.comcastbiz.net">shenderson@franzlaw.comcastbiz.net</a></p> <p>Attorneys for Defendants Mark Dannels, Pat Downing, Estate of Dave Hall, Kris Karcher, Raymond McNeely, Kip Oswald, Michael Reaves, Sean Sanborn, Eric Schwenninger, Chris Webley, Anthony Wetmore, Craig Zanni, David Zavala, City of Coquille, City of Coos Bay, and Coos County</p>	<p>OREGON DEPARTMENT OF JUSTICE</p> <p>By <u>s/Todd Marshall</u>  Jesse B. Davis, OSB #052290  E-Mail: <a href="mailto:jesse.b.davis@state.or.us">jesse.b.davis@state.or.us</a>  Todd Marshall, OSB #112685  E-Mail: <a href="mailto:todd.marshall@doj.state.or.us">todd.marshall@doj.state.or.us</a></p> <p>Attorneys for Defendants Susan Hormann, Mary Krings, John Riddle, Kathy Wilcox, and Oregon State Police</p>
<p>HWS LAW GROUP</p> <p>By <u>s/Meredith A. Sawyer</u>  Anthony R. Scisciani III, OSB #070013  E-Mail: <a href="mailto:ascisciani@hwslawgroup.com">ascisciani@hwslawgroup.com</a>  Kelsey L. Shewbert, OSB #221063  E-Mail: <a href="mailto:kshewbert@hwslawgroup.com">kshewbert@hwslawgroup.com</a>  Meredith A. Sawyer, <i>pro hac vice</i>  E-Mail: <a href="mailto:msawyer@hwslawgroup.com">msawyer@hwslawgroup.com</a></p> <p>Attorneys for Defendant Vidocq Society</p>	<p>LUVAAS COBB</p> <p>By <u>s/Eric S. DeFreest</u>  Eric S. DeFreest, OSB #920475  E-Mail: <a href="mailto:edefreest@luvaascobb.com">edefreest@luvaascobb.com</a>  Laura E. Coffin, OSB #075825  E-Mail: <a href="mailto:lcoffin@luvaascobb.com">lcoffin@luvaascobb.com</a></p> <p>Attorneys for Defendant Richard Walter</p>

**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2023, the foregoing JOINT STATUS REPORT REGARDING DEPOSITION SCHEDULE FOR NON-EXPERT WITNESSES was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants</i> <i>City of Coquille, City of Coos Bay, Coos</i> <i>County, Craig Zanni, Chris Webley, Eric</i> <i>Schwenninger, Sean Sanborn, Ray McNeely,</i> <i>Kris Karcher, Pat Downing, Mark Dannels,</i> <i>Kip Oswald, Michael Reaves, David Zavala,</i> <i>Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Todd Marshall Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd.marshall@doj.state.or.us jesse.b.davis@doj.state.or.us <i>Attorneys for Defendants Oregon State</i> <i>Police, John Riddle, Susan Hormann,</i> <i>Mary Krings, Kathy Wilcox</i>
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- ☒ by electronic means through the Court's ECF System on the date set forth above.
- ☐ by mailing a full, true and correct copy thereof in a sealed, first-class postage paid envelope, addressed to the attorneys as shown above, and deposited with the United States Postal Office at Portland, Oregon on the date set forth above.

- ☐ by emailing to each of the foregoing a copy thereof to the email address above.

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